

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.  
LITIGATION

) Civil Action No. 04-10294-DPW  
) (Lead Case)

)

)

THIS DOCUMENT RELATES TO:  
ALL CASES

) **DECLARATION OF SOLOMON B.**  
) **CERA IN SUPPORT OF LEAD**  
) **PLAINTIFF'S UNOPPOSED MOTION**  
) **FOR EXTENSION OF TIME TO FILE**  
) **CONSOLIDATED AMENDED**  
) **COMPLAINT**

)

I, Solomon B. Cera, declare:

1. I am a partner of Gold Bennett Cera & Sidener LLP, counsel for lead plaintiff BPI Global Asset Management LLP. I submit this declaration in support of the motion for an extension of time to file a Consolidated Amended Complaint to and including December 1, 2004. The matters stated herein are true of my own personal knowledge and, if called to testify thereto, I could and would competently do so.

2. By its Order of August 10, 2004, the Court set October 12, 2004 as the deadline for Lead Plaintiff to file a Consolidated Amended Complaint.

3. Lead Plaintiff presently anticipates that the claims in this case will cover a two (2) year period of statements by defendant Sonus Networks, Inc., and others, commencing with the filing on March 28, 2002 of Sonus's SEC Form 10-K Annual Report for the year ending December 31, 2001. The claims will likely extend through March 29, 2004 when Sonus announced a delay in the filing of its Amended Annual Report on Form 10K/A for fiscal year

2003. On or about July 28, 2004 Sonus restated its financial results for the fiscal years ending December 31, 2001 and 2002 and the nine months ended September 30, 2003. As recently as August 20, 2004, Sonus restated its results for the second quarter of fiscal year 2003. There are a multitude of statements which will be challenged as materially misleading during the foregoing time period. Sonus also completed two registered offerings of its common stock during this period, on April 22, 2003 and September 24, 2003.

4. Lead Plaintiff's counsel has been working diligently and in good faith to prepare a comprehensive statement of the claims and supporting factual detail, but nonetheless requires the extension to December 1, 2004. I have conferred with defendants' counsel, James W. Prendergast, Esq. of Wilmer Cutler Pickering Hale and Dorr LLP regarding this requested extension, and he has advised me that none of the defendants oppose the requested extension.

5. Lead Plaintiff will not seek any further extensions to file the Consolidated Amended Complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of September 2004 at San Francisco, California.

  
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Solomon B. Cera